



**United States Department of Justice**

*United States Attorney  
Northern District of New York*

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January 18, 2019

Hon. Thomas J. McAvoy  
Senior U.S. District Judge  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, New York 13901

Re: *United States v. Maximilien Reynolds*  
Criminal No. 5:18-MJ-139 (TWD)

Dear Judge McAvoy:

This letter is to request a brief extension in the time for the United States to file its response to the defendant's appeal of Judge Stewart's Detention Order in United States v. Maximilien Reynolds, 3:18-CR-321 (TJM). The Government's response is due today, January 18, 2019. However, due to problems created by the current shutdown of parts of the federal government, which includes the United States Department of Justice, our office is operating with a minimal staff and very minimal support staff.

It is requested that the Court permit the Government to file its response on or before Wednesday January 23, 2019. I have discussed this with defense counsel Kimberly Zimmer, Esq., who has advised she does not object to this request for extension to file our response.

Respectfully,

GRANT C. JAQUITH  
United States Attorney

By:

A handwritten signature in blue ink, appearing to read "Richard R. Southwick".  
Richard R. Southwick  
Assistant United States Attorney  
Bar Roll No. 506265